

January 14, 2003

TO: Internal File

FROM: Wayne Western, Team Lead

RE: Revised Mine Plan, Consolidation Coal Company, Emery Deep Mine, C/015/015, AM02E

SUMMARY:

On December 12, 2002, the Division received amendment AM02E for the Emery Deep Mine. The amendment deals specifically with a modification of the mine plan.

OPERATION PLAN

SUBSIDENCE CONTROL PLAN

Regulatory Reference: 30 CFR 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724.

Analysis:

Subsidence Control Plan

A subsidence control plan for the Emery Deep Mine was developed before the new mine layout. The approved subsidence control plan shows areas where subsidence was not permitted due to alluvial valley floors, stream buffer zones or structures. See Plate V-5 for details.

While the proposed areas to be mined do not appear to include areas where subsidence is not permitted, the subsidence control map needs to be updated to verify that information. At a minimum the Permittee must show the areas to be mined, subsided and the areas to be protected.

TECHNICAL MEMO

Findings:

The information provided in the Amendment AM02E is not considered adequate to meet the minimum requirements of the subsidence regulations. Prior to approval, the Permittee must provide the Division with the following in accordance with:

R645-301-525.420, The Permittee must update the subsidence maps to show the location of the proposed mine workings, the areas where subsidence is expected and the areas that will be protected from subsidence.

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Mine Workings Maps

Plate IV-2, UG Operations Plan, shows the locations and extent of the known mine workings of the proposed operational areas and inactive or abandoned underground mine workings. In addition, the Permittee also included area of future mining. Some of the areas of future mining appear to be outside the permit boundary. The Division assumes that the red line in the permit boundary.

To avoid confusion the Permittee needs to label the permit boundary and add other reference points such as UTM, State Plane Coordinates, or Township, Range and Section lines.

Certification Requirements

James Hinz, a registered profession engineer, has certified the mine map.

Findings:

The information provided in the Amendment AM02E is not considered adequate to meet the minimum requirements of the maps, plans and cross-sections regulations. Prior to approval, the Permittee must provide the Division with the following in accordance with:

R645-301-521.190, The Permittee must update the mine maps (UG Operations Plan Plate IV-2) to show the permit boundaries and a coordinate system such as UTM, State Plane or Township and Range.

RECOMMENDATIONS:

The Division should deny the approval for the amendment until all of the above mentioned deficiencies have been addressed.

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